

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA,  
*ex rel.* GORDON F.B. ONDIS,  
Plaintiff,

v.

CIVIL NO. 05-10312-MLW

CITY OF WOONSOCKET, RHODE  
ISLAND; SUSAN D. MENARD, in her  
individual capacity and in her capacity as  
Mayor of the City of Woonsocket, Rhode  
Island; JOEL D. MATHEWS, in his  
individual capacity and in his capacity as  
Director of Planning and Community  
Development of the City of Woonsocket,  
Rhode Island; PAULETTE MILLER, in  
her individual capacity and in her capacity  
as Assistant Director of Planning and  
Community Development of the City of  
Woonsocket; OWEN T. BEBEAU, in his  
individual capacity and in his capacity as  
Director of Human Services of the City of  
Woonsocket, Rhode Island; MICHAEL  
ANNARUMMO, in his individual capacity  
and in his capacity as Director of  
Administration and Director of Public  
Works of the City of Woonsocket, Rhode  
Island;  
Defendants.

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**JOINT STATEMENT OF PARTIES  
UNDER LOCAL RULE 16.1(D)**

The Parties hereby submit, pursuant to Local Rule 16.1(D) and the Notice of Scheduling Conference dated December 18, 2006, this Joint Statement:

**I. Discovery and Motion Schedule**

The parties propose the following dates for discovery and dispositive motions:

14-days after ruling on motion to dismiss	Automatic discovery under Fed. R. Civ. P. 26(a)
Sixty days after ruling on motion to dismiss	Responses to document requests and interrogatories completed, except requests or interrogatories made in response to subsequently received discovery
Ninety days after deadline immediately above	Fact depositions and any additional fact discovery concluded
Thirty days after deadline immediately above	Designation of expert witnesses and disclosures pursuant to Fed. R. Civ. P. 26(a)(2)
Fifteen days after deadline immediately above	Counter-designation of expert witnesses and disclosures pursuant to Fed. R. Civ. P. 26(a)(2)
Thirty days after deadline immediately above	Depositions of experts concluded
Thirty days after deadline Immediately above	Summary judgment motions filed

**II. Certifications**

Certifications of each counsel and party that each party and counsel have conferred concerning matters of budget, cost and alternative dispute resolution programs in accordance with Rule 16.4 are being filed by each party separately.

Respectfully submitted,

**CITY OF WOONSOCKET, RHODE ISLAND; SUSAN D. MENARD; JOEL D. MATHEWS; PAULETTE MILLER; OWEN T. BEBEAU; and MICHAEL ANNARUMMO**

By their Attorneys,

/s/ Michael B. Galvin  
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**Government of the United States**  
***ex rel.* Gordon F.B. Ondis**  
By His Attorney,

/s/ Leon A. Blais  
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**SUSAN D. MENARD, in her individual capacity,**  
By her Attorney,

/s/ Howard R. Croll  
Howard R. Croll (BBO No. 105380)  
**FONTAINE & CROLL, LTD.**  
34 Hamlet Avenue  
Woonsocket, RI 02895  
(401) 765-0200

Dated: January 24, 2007

**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that a true and correct copy of this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on January 24, 2007.

/s/ Michael B. Galvin

Dated: January 24, 2007

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